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11 *Attorneys for Plaintiff EMULAIT, INC. f/k/a
PROXAMAMA, INC.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

15 EMULAIT, INC. f/k/a PROXAMAMA, INC.,
16 Plaintiff,

Case No. 2:24-CV-02267-APG-NJK

17 v.
18 ROEMBKE TURNKEY SOLUTIONS, LLC,
19 ROEMBKE MFG. & DESIGN, INC., and
20 GREGORY J. ROEMBKE,
Defendants.

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND
TO DEFENDANTS' MOTION TO
DISMISS OR TO TRANSFER**

(First Request)

22 Pursuant to Local Rules IA 6-1, IA 6-2, and LR 7-1, Plaintiff Emulait, Inc. f/k/a
23 Proxamama, Inc. (“Plaintiff”) and Defendants Roembke Turnkey Solutions, LLC, Roembke Mfg.
24 & Design, Inc., and Gregory J. Roembke (“Defendants,” together with Plaintiff, the “Parties”),
25 respectfully request that the Court approve this Stipulation to Extend the Deadline to Respond to
26 Defendants’ Motion to Dismiss or to Transfer. This is the Parties’ first request.

1 IT IS HEREBY STIPULATED AND AGREED as follows:

2 1. Defendants filed their Motion to Dismiss or to Transfer [ECF Nos. 16 and 17] (the
3 "Motion") on January 17, 2025.

4 2. The current deadline for Plaintiff to file its response to Defendants' Motion is
5 January 31, 2025.

6 3. Defendants consent to a two-week extension on Plaintiff's response deadline, as
7 Defendants had also requested and were granted a two-week extension to file a response to the
8 Complaint, which the Court approved [ECF No. 15].

9 4. Plaintiff requests the extension to permit sufficient time for Plaintiff and its
10 employees to locate the documentation necessary to support the declaration it intends to file in
11 support of its opposition to Defendants' Motion to Dismiss or to Transfer.

12 5. This request is not intended to cause delay or prejudice any party.

13 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between
14 the Parties that the time for Plaintiff to respond to Defendants' Motion to Dismiss or to Transfer
15 be extended to February 11, 2025.

16 DATED this 28th day of January, 2025.

17 FOX ROTHSCHILD LLP

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19 /s/ Rex D. Garner
REX D. GARNER (SBN 9401)
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22 *Attorneys for Plaintiff EMULAIT, INC. f/k/a*
PROXAMAMA, INC.

23 DATED this 28th day of January, 2025.

24 KAEMPFER CROWELL

25
26 /s/ Louis M. Bubala
LOUIS M. BUBALA III (SBN 8974)
KRIS KALKOWSKI (SBN 14892)

27 *Attorneys for Defendants ROEMBKE*
TURNKEY SOLUTIONS, LLC, ROEMBKE
MFG. & DESIGN, INC., and GREGORY J.
ROEMBKE

28 IT IS SO ORDERED:

29 Dated: January 29, 2025



30
31 ANDREW P. GORDON
32 CHIEF UNITED STATES DISTRICT JUDGE